

In the United States District Court
Northern District of Texas
Dallas Division

John T. Lamont and Preston	§	
Poulter	§	
Plaintiffs	§	
	§	
v.	§	No. 3:21-cv-1176-K-BN
	§	
Dean Assaf a/k/a DA Talk and	§	
Victoria Kundert a/k/a Vikkiverse	§	
Defendants	§	

Declaration of John T. Lamont

John T. Lamont, pursuant to 28 U.S.C. § 1746, hereby declares as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The facts set out in this Declaration are based on my personal knowledge.
2. I am a named plaintiff in this matter.
3. I launched my first comic, The Demonatrix on March 1, 2021 with projected sales of \$5,000.00. On the same day the comic was launched, Defendants Ali "Dean" Assaf and Victoria Kundert began an intense campaign of denigration and vilification of me calling me a pedophile. Comic book sales immediately stalled. Some prospective customers refused to support the campaign citing allegations of being a pedophile. Poor sales forced the campaign's cancellation.

~~4. Despite having previously approved The Demonatrix for their platform, Kickstarter rejected it upon re-submission by me. Kickstarter declined to approve my next book project "Angel of Darkness." Defendants' defamatory statements have chilled all future sales opportunities for me because Kickstarter has shut me out with unprecedented demands. As a result of the defamatory statements, Kickstarter has now also rejected my next comic book project "Angel of Darkness." Defendants' defamatory statements have chilled all future sales opportunities for me because Kickstarter has shut me down with unreasonable demands. Based upon my projections of 4-5 comics per year I will suffer in a loss of approximately \$25,000.00 in annual sales and at least \$75,000.00 for the next 3 years.~~

5. As a result of the acts of Defendants' conduct, I have experienced significant stress, anxiety, sleeplessness, headaches, stomach pains and a racing heart. I have been unable to participate in the comic community without suffering from heart palpitations and anxiety.

6. I have kept to myself for fear of his safety. I have isolated myself and stopped going out for fear of my life, I experienced anxiety attacks on those occasions when I did go into town as well as shortness of breath and accelerated heart rate. I suffered from many sleepless nights, and has resorted to involuntary stress eating, has gained a significant amount of weight, my cholesterol is high and my doctor has expressed concern for my overall health. I have also been forced to keep to myself for fear that others who are not in the comic community will learn of the defamatory comments.

7. I fear for my personal safety. After I was doxxed, I had to notify the local sheriff's department because I fear that I will be harmed and fears for the safety of my family members. In addition, it is typical for comic book authors to attend trade gatherings to promote additional and future sales. I am afraid to attend the upcoming show due to fears that I will be ostracized, assaulted and fears for my personal safety based upon the defamatory statements. This constitutes an expected loss of sales due to not attending conventions and meetings of approximately \$5,000.00 to \$10,000.00 per year

8. I will incur additional and heightened expenses for public relations to overcome and repair the damages to my reputation and business due to the defamatory statements in an amount to be determined through an expert witness.

9. I have had to pursue counseling and will have weekly visits for the foreseeable future. My therapist charges \$160.00 per hour and my expected costs for therapy is approximately \$24,960.00 for the next 3 years.

10. I am experiencing symptoms of PTSD that come on suddenly such that I cannot function as I have in the past. I have experienced pain and mental anguish this year and have been prevented from being able to conduct daily life functions. I will continue to suffer pain and mental anguish for a long time into the future, especially since the defamatory remarks have been disseminated to a large part of the community of comic book professionals and enthusiasts. I seek in excess of \$150,000.00 in mental anguish damages for the devastating and reprehensible unfounded accusations of Defendants.

11. Damages to my reputation also exceed \$150,000.00.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 2, 2022.

John T. Lamont